UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SOLID 21, INC.,

v.

Civil Action No. 1:19-cv-01262-LGS

Plaintiff,

NOTICE OF MOTION TO WITHDRAW AS COUNSEL

RICHEMONT NORTH AMERICA, INC.; RICHEMONT INTERNATIONAL S.A.;

MONTBLANC-SIMPLO GMBH; and OFFICINE PANERAI A.G.,

Defendants.

PLEASE TAKE NOTICE that upon the accompanying Affidavit of David L. Hecht in Support of his Motion to Withdraw as Counsel, pursuant to Local Rule 1.4 of this district for the following relief to withdraw as counsel of record for Plaintiff; grant Plaintiff sixty (60) days to retain new counsel; grant Plaintiff an extension of time to file an opposition to Defendants Motion In Limine No.3 (ECF 171), and grant such other relief as the Court may determine to be just, equitable and necessary.

Dated: November 10, 2022

Respectfully submitted,

HECHT PARTNERS LLP

A telephone conference will be held to discuss this motion on November 16, 2022, at 4:20 P.M. In addition to counsel, a principal or owner for Plaintiff shall also appear. At that time, the parties shall call 888-363-4749 and use the access code 558-3333.

T: (212) 851-6821

David L. Hecht

/s/ David L. Hecht

New York, NY 10017

E: dhecht@hechtpartners.com

125 Park Avenue, 25th Floor

Counsel for Plaintiff Solid 21, Inc.

So Ordered.

Dated: November 10, 2022 New York, New York

> LORNA G. SCHOFIELD UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, David L. Hecht, hereby certify that on this 9th Day of November, 2022, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system. Additionally, I have caused a copy of the foregoing document to be emailed to Solid 21, Inc. at: ca@chrisaire.com and christopheraire@icloud.com.

/s/ David L. Hecht
David L. Hecht